

1 UNITED STATES DISTRICT COURT  
2 EASTERN DISTRICT OF MISSOURI  
3 EASTERN DIVISION  
4 James Garavaglia, )  
5 )  
6 Plaintiff, )  
7 )  
8 v. ) Case No. 4:20-CV-1681-CDP  
9 )  
10 City of St. Louis, )  
11 et al., )  
12 )  
13 Defendants. )  
14 )  
15 )  
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24 )  
25 )

DEPOSITION OF LINDA THOMAS

Taken on behalf of the Plaintiff  
April 19, 2022

Julie Ann Whiting, CCR 830, RPR



1     **putting somebody on forced leave? Under what**  
2     **circumstance?**

3           A     I told her what was required under the  
4     Administrative Regulation 117.

5           **Q     Which was what?**

6           A     That she had to provide a letter to the  
7     employee with the charges against them and give a  
8     copy of that to the Director of the Personnel within  
9     72 hours for him to approve or disapprove, whatever  
10    the case might be.

11          **Q     Did you also tell her she also had to make**  
12    **a request to the Department of Personnel to put --**

13          A     Yes. That's what the letter was.

14          **Q     Okay. Well, you were talking about a**  
15    **letter to Jim Garavaglia.**

16          A     No. I'm talking about the letter to the  
17    Director of Personnel. The letter to Jim was to  
18    tell him he was being put on forced leave under the  
19    regulation, but the letter she was talking to me  
20    about was to the Director of Personnel, because she  
21    had to get his approval --

22          **Q     Right.**

23          A     -- with 72 hours.

24          **Q     Was there any discussion at that meeting**  
25    **as to what the alleged -- or accusations were or the**

1     **alleged things she was identifying to justify the**  
2     **forced leave?**

3           A     The only thing she mentioned at that  
4     meeting was something about a telephone bill and  
5     signatures on contracts.

6           Q     **Anything more specific about the phone**  
7     **bill? I'm talking about at this meeting.**

8           A     At the meeting with the Comptroller?

9           Q     **Yes, the first one.**

10          A     Just that it -- there was a bill that was  
11     over \$400,000. That was it. No more specific about  
12     the contracts.

13          Q     **Anything about the bill?**

14          A     No.

15          Q     **What did she tell you about signatures on**  
16     **contracts?**

17          A     Nothing. That's it.

18          Q     **Well, she must -- I mean, she didn't tell**  
19     **you anything about why?**

20          A     She told me there was a problem with  
21     signatures on contracts.

22          Q     **But she didn't tell you anything more?**

23          A     No, she did not.

24          Q     **Okay. Did you have any knowledge at that**  
25     **time as to what the rules were in the Comptroller's**

1           Q     Okay. So you weren't involved in the  
2     phone call?

3           A     No, I was not.

4           Q     You didn't know about it until afterwards?

5           A     Correct.

6           Q     Do you know who else was on that call?

7           A     No, I do not.

8           Q     Do you know if Chana Martin played a role  
9     in arranging for that phone call?

10          A     I have --

11               MR. NORWOOD: Morton.

12          Q     (By Mr. Blanke) I keep saying Martin.  
13     I'm trying to say Morton, but it's not coming --

14          A     I have no idea.

15          Q     Okay. You don't remember. Okay. You  
16     don't know?

17          A     (Witness nods.)

18               MR. NORWOOD: Do you know?

19               MS. McMILLEN: Was that a no, for the  
20     record?

21          A     It was a no. I'm sorry.

22          Q     (By Mr. Blanke) Do you know what was  
23     discussed in that phone conversation that Rick Frank  
24     told you about between Judy Armstrong and himself?

25          A     I believe that was the conversation where

1 he discussed with them that the forced leave  
2 letter -- he wasn't comfortable with and needed it  
3 changed, but I wasn't party to it.

4 **Q Why would he have done that if it -- was**  
5 **this phone call between Rick Frank and Chana Morton**  
6 **before or after your phone call with Comptroller**  
7 **Green?**

8 MS. HAMILTON: I'm going to object that  
9 that mischaracterizes the witness' testimony as  
10 to the parties to the call. Subject to that,  
11 you can answer.

12 **Q (By Mr. Blanke) Well, let me rephrase it.**

13 MR. BLANKE: Can you read it back?  
14 Because I'm not sure what I said. I must have  
15 made a mistake. Can you read that question  
16 back?

17 (The last question was read.)

18 MR. BLANKE: I'll withdraw that question  
19 and try to do it the correct he way.

20 **Q (By Mr. Blanke) Was the phone call**  
21 **between Rick Frank and Judy Armstrong that**  
22 **Rick Frank told you that -- okay -- and your phone**  
23 **call with Darlene Green that Rick Frank asked you to**  
24 **make before or -- which one came first?**

25 A The conversation with Judy Armstrong would

1 have come first.

2 Q Okay. So do you know why, then, after he  
3 already talked to Judy Armstrong that he wanted you  
4 to call Comptroller Green?

5 A I have no idea.

6 Q Okay. Did Rick Frank tell you that in his  
7 phone call with Judy Armstrong that -- or even after  
8 that that a correction would be made to the forced  
9 leave request?

10 A Well, he asked me to call the Comptroller  
11 to make the request -- the correction.

12 MS. HAMILTON: And I'll just --

13 Q (By Mr. Blanke) Did he tell you any --

14 MR. BLANKE: I'm sorry?

15 MS. HAMILTON: I'll just say the documents  
16 may refresh the witness' recollection.

17 MR. BLANKE: Yeah, I'll do that. I just  
18 want to know what she recalls, first of all.

19 Q (By Mr. Blanke) Did you know -- can you  
20 be any more specific about what you discussed with  
21 Comptroller Green on your phone call with her?

22 A Just that the Director wanted those  
23 changes -- wanted changes.

24 Q About what were the changes, do you  
25 remember?